

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**PAMELA PRICE,
Plaintiff,**

v.

**ALLSTATE VEHICLE AND
PROPERTY INSURANCE COMPANY,
Defendant.**

§
§
§
§
§
§
§
§

**CIVIL ACTION NO. 3:16-CV-02907-N
JURY**

AGREED MOTION FOR DISMISSAL WITH PREJUDICE

TO THE HONORABLE COURT:

Plaintiff Pamela Price and Defendant Allstate Vehicle and Property Insurance Company file this their Agreed Motion for Dismissal with Prejudice and would respectfully show unto the Court the following:

I.

Plaintiff and Defendant, through their counsel of record, announce to the Court that all matters in controversy between them have been fully and finally resolved. Plaintiff no longer desires to prosecute this suit against Defendants. The intent of this Agreed Motion for Dismissal is to dismiss all Defendants from this cause of action whether or not specifically referred to herein.

II.

Plaintiff and Defendant move this Court to dismiss this case with prejudice as to all Defendants, with costs to be taxed against the party incurring same.

WHEREFORE, Plaintiff and Defendant respectfully request the Court enter their Agreed Order of Dismissal with Prejudice as to Plaintiff's right to refile same.

Respectfully submitted,

/s/ James M. McClenny*

James M. McClenny
State Bar No. 24091857
J. Zachary Moseley
State Bar No. 24092863
Derek L. Fadner
State Bar No. 24100081
McCLENNY MOSELEY & ASSOCIATES, PLLC
411 N. Sam Houston Parkway E., Suite 200
Houston, Texas 77060
Principal Office No. 713-334-6121
Facsimile: 713-322-5953
Derek@mma-pllc.com
James@mma-pllc.com
Zach@mmaa-pllc.com

** signed with permission*

ATTORNEYS FOR PLAINTIFF

/s/ Roger D. Higgins

Roger D. Higgins
State Bar No. 09601500
Ashley B. Stainton
State Bar No. 24095731
THOMPSON, COE, COUSINS & IRONS, L.L.P.
700 North Pearl Street, 25th Floor
Dallas, Texas 75201
Telephone: (214) 871-8200
Telecopy: (214) 871-8209
rhiggins@thompsoncoe.com
astainton@thompsoncoe.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2017, a true and correct copy of the foregoing has been forwarded to counsel of record in accordance with the Texas Rules of Civil Procedure:

James M. McClenny
J. Zachary Moseley
Derek L. Fadner
McCLENNY MOSELEY & ASSOCIATES, PLLC
411 N. Sam Houston Parkway E., Suite 200
Houston, Texas 77060
Principal Office No. 713-334-6121
Facsimile: 713-322-5953
Derek@mma-pllc.com
James@mma-pllc.com
Zach@mmaa-pllc.com

/s/ Ashley Stainton
Ashley B. Stainton